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Connit v. Church, 54 N. Y. 551. But although civil courts have no power to rejudge the rulings of ecclesiastical tribunals as to matters within their jurisdiction, it has been held that the jurisdiction may be inquired into. *Perry v. Wheeler*, 75 Ky. 541; *Samsell v. Escher*, 11 Ohio Dec. 351. Still, in order for a civil court to have jurisdiction, it must obtain it because some civil or property rights have been violated. *Grimes v. Harmon*, 35 Ind. 198; *Bird v. Church*, 62 Iowa 567. Thus a deposed minister, simply as such, has no civil redress, even though he lose reputation and means of livelihood because of the deposition. *Watson v. Garvin*, 54 Mo. 353. Cases as apparently in conflict as *Chase v. Cheney*, 58 Ill. 509, and *Kreiker v. Shirley*, 163 Pa. 534, the first of which holds that the civil courts will not interfere with religious associations to revise their decision upon ecclesiastical matters, or for the purpose of ascertaining their jurisdiction, and the second of which holds that the laws of an ecclesiastical body will be reorganized and enforced by the civil courts, if not in conflict with the constitution or laws of the state, are reconcilable, if it is considered that the civil courts take jurisdiction only when civil or property rights are violated, *ante*, and that the proceedings of religious associations should receive the same consideration as those of any other voluntary association. *Smith v. Nelson*, 18 Vt. 511. See *xiv Yale Law Journal*, 398.

PRINCIPAL AND AGENT—AUTHORITY OF AGENT—ADMISSIBILITY OF EVIDENCE.—QUALE V. HAZEL, 104 N. W. 215 (S. D.).—*Held*, that where a plaintiff in an action for commission for the sale of land for the defendant, alleged that the contract sued on was made with the defendant's agent, whose authro ity to contract with the plaintiff the defendant denied, the contract between the defendant and his agent, which the defendant testified was the only contract that he had made regarding the sale of the land, was admissible.

Where the nature and extent of the agency is contested, a letter from the principal to the agent bearing upon the scope of his authority is admissible *Slonecker v. Garrett*, 48 Pa. 415; *Bell v. Rankin*, 1 Kan. App. 209. Any paper of this nature that is shown by the agent to the adverse party, even although not used in the transaction between them, is admissible to show the limitations upon the agent's authority. *Deane v. Everett*, 90 Iowa 242; *Herring v. Skaggs*, 62 Ala. 180. The fact that it is not written to the adverse party does not prevent its admission as evidence. *Morse v. Diebold*, 2 Mo. App. 163. So a power of attorney to sell real estate may be concerned in a letter or any other kind of a private writing. *Wheelage v. Lotz*, 44 La. Ann. 600. By any of the above means, it is competent for a principal appointing a special agent to show what his instructions to such agent were, in order to prove the extent of the agent's authority. *Nininger v. Knox*, 8 Minn. 140.

DIVORCE—EVIDENCE OF CO-RESPONDENT.—DELANEY V. DELANEY, 61 ATL. 226 (N. J.).—*Held*, that the uncorroborated evidence of a co-respondent is sufficient evidence on which to grant a divorce.

Generally it has not been so held, although it has been said to be rather a precaution of the courts than a rule of law. *Evans v. Evans*, 93 Ky. 512; *Moller v. Moller*, 15 N. Y. 466. The reason is that the paramour shows, by his very statement, his character to be such that a serious matter, like a decree of divorce, should not be allowed on his unsupported testimony. Some cases, however, follow the law of the principal case in declaring that it is sufficient where it is the only evidence or where the evidence is of equal weight. *Mayer v. Mayer*, 21 N. J. Eq. 286; *Herrick v. Herrick*, 31 Mich. 298.